



Decision _____

FILED

12/16/22

03:10 PM


A2212013

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Application of Green Power Institute for award of intervenor compensation for substantial contributions to Resolution Numbers SPD-1, SPD-2 and SPD-3.	A.22-12-0xx (Filed Dec. 16, 2022)
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**INTERVENOR COMPENSATION CLAIM OF GREEN POWER INSTITUTE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF GREEN
POWER INSTITUTE**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at lcompcoordinator@cpuc.ca.gov.

Intervenor: Green Power Institute	For contribution to Resolutions SPD-1, SPD-2 and SPD-3	
Claimed: \$ 51,776	Awarded: \$	
Exec. Director: Rachel Peterson	Assigned ALJ: None Assigned	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		
Date: December 16, 2022	Printed Name:	Gregg Morris

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	SPD-1, Ratifying Action of OEIS on SDG&E's 2022 WMP SPD-2, Ratifying Action of OEIS on SCE's 2022 WMP SPD-3, Ratifying Action of OEIS on 2023 WMP Metrics and Guidelines
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	None	
2. Other specified date for NOI:	None	
3. Date NOI filed:	Concurrent with this Request for Compensation (see Attachment 12).	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.20-05-002	
6. Date of ALJ ruling:	November 20, 2020	
7. Based on another CPUC determination (specify):	D.22-06-041	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-05-002	
10. Date of ALJ ruling:	November 20, 2020	
11. Based on another CPUC determination (specify):	D.22-06-041	

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	SPD-3	
14. Date of issuance of Final Order or Decision:	November 18, 2022	
15. File date of compensation request:	December 16, 2022	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor's Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	
1. WMP Methodology. The GPI made substantial contributions to Resolution SPD-3 by providing analysis and insights into the issues of restructuring the WMP guidelines, metrics for judging the effectiveness of the WMPs, transparency, and vegetation management and the treatment of vegetation management residues in WMP measures. OEIS adopted many of our suggestions, and in instances where our positions were not	Resolution SPD-3 Pursuant to § 8389(d)(1), this Resolution adopts additional and amended performance metrics, along with the metrics used to evaluate the 2021 and 2022 Wildfire Mitigation Plans (WMP) as recommended by Energy Safety. Performance metrics are intended to assess utility performance and outcomes resulting from executing the WMPs. [SPD-3, pg. 2.] Energy Safety is drafting the 2023 Draft WMP Guidelines and states that while it expects the guidelines will change the	

<p>adopted, we made substantial contributions by enriching the record underlying the decisions.</p>	<p>level of granularity required in the WMPs, it will not add requirements because the information to be included in the plan stems from the WMP requirements defined in Pub. Util Code § 8386(c). [SPD-3, pg. 2.]</p> <p>Pleadings</p> <p>GPI appreciates the OEIS decision to host the December 9, 2021, workshop on IOU Risk Spend Efficiency (RSE) calculation methodology and application. This workshop provided much needed additional detail regarding how each IOU is calculating RSE values for each mitigation activity. However, while the IOU presentations filled in some information gaps in the RSE calculation methodology there are still substantial informational gaps regarding RSE inputs, assumptions, and calculation methods for each mitigation by each IOU. [Comments, 1/10/22, pg. 1.]</p> <p>The high-level introduction to the direction OEIS is considering for the 2023 WMP submissions and 2023-2025 3-year WMP cycle <i>initiates</i> public and stakeholder engagement in the development process. However, a more comprehensive and detailed proposed guidelines is required to adequately review the major changes being considered for the updated WMP Guidelines. [Comments, 5/6/22, pg. 1.]</p> <p>GPI generally supports the proposed restructuring of the WMP guidelines relative to the organizational structure used in the 2020- 2022 WMP filings. Namely, we agree with OEIS that the issue of redundant information persists, and a reviewer must cross-reference multiple sections to understand why, how, when, where, and who is implementing a given mitigation, as well as whether each utility is actively</p>	
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	<p>assessing mitigation efficacy and using those findings to refine approach. [Comments, 5/6/22, pg. 5.]</p> <p>GPI generally supports the proposal to develop and require adherence to a WMP template. A well-structured template will provide utilities with ample opportunity to provide a comprehensive description of their programs without needing additional, customized sections. This will also support cross-comparisons with respect to how each utility is developing and deploying customized methods to address universal issues (e.g. vegetation management and contact from vegetation risk). [Comments, 5/6/22, pg. 6.]</p> <p>GPI recommends retaining and restructuring the Vegetation Management and Inspections sub-section regarding “Fuel Management and Management of All Wood and ‘Slash’ From Vegetation Management Activities.” [Comments, 5/6/22, pg. 8.]</p> <p>GPI generally supports restructuring WMP Update filings to only include those elements which are changed relative to the 3-year base plan including progress reports and updated risk maps, identified areas for improvement, errata, and approved Change Order requests. GPI does not support the proposal to freeze risk modeling. [Comments, 5/6/22, pg. 13.]</p> <p>We agree that risk analysis reporting requirements should be restructured and expanded in order to increase transparency. Structurally, each of the four proposal elements (above) and the proposed Risk Modeling and Assessment Section (proposed Section 4) should be designed with the goal of increasing transparency. The need for</p>	
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	<p>transparency is a cross-cutting factor. [Comments, 5/6/22, pg. 16.]</p> <p>GPI recommends adding a new Vegetation Management and Inspections capability 22. “Vegetation residue management” that specifically calls for utilities to report on their vegetation residue removal method (Level 1), tracking of total vegetation residue production (Level 2), a complete summary of end-use and disposal pathways (Level 3), and the mass of residue routed to waste versus each end-use pathway and a description of each disposal method (Level 4). [Comments, 5/6/22, pg. 30.]</p>	
<p>2. Review of 2022 SDG&E WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-1 by performing a detailed analysis of SDG&E’s 2022 WMP update, and providing the Commission with the results of our analysis and our recommendations for fixing deficiencies in the plan before the end of the three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to SDG&E, and in drafting their decision to accept the update, which SPD-1 endorses. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>Resolution SPD-1</p> <p>SDG&E submitted its WMP Update for 2022 on February 11, 2022, and provided an overview of the WMP in a workshop overseen by Energy Safety on March 10, 2022. Comments on the WMPs were due on April 11, 2022 and reply comments were due on April 18, 2022. Comments were provided by the California Department of Fish and Wildlife (CDFW), the Green Power Institute (GPI) ... [Res. SPD-1, pg. 4.]</p> <p>GPI, Cal Advocates, and SDG&E submitted timely comments to Energy Safety on or before June 8, 2022 ... on Energy Safety’s draft decision approving SDG&E’s 2022 WMP Update. [Res. SPD-1, pg. 5.]</p> <p>Energy Safety evaluated these comments and concurred with and in some instances incorporated the following stakeholder input on SDG&E’s 2022 Update, as reflected in this Decision (Res. SPD-1, pgs. 11-12, selected bullet points shown):</p>	

	<ul style="list-style-type: none"> • SDG&E should “reduce the long-term need for extensive tree trimming and slash production” (GPI). • Activities and mitigation in SDG&E’s WMP should address drivers that resulted in utility-caused wildfires (GPI, Abrams). • SDG&E should evaluate risk outside of the CPUC’s high fire threat district (HFTD) based on risk model outputs to identify any necessary additional areas that pose high wildfire risk and adjust their wildfire mitigations activities accordingly (GPI). • SDG&E and its peer utilities should provide more information on mitigation initiative lifecycle benefits used to determine risk-spend efficiency estimates (GPI). • SDG&E should perform a more complete assessment of the possible impacts of climate change on both probability of ignition and consequence (GPI). • SDG&E and its peer utilities should address aeolian vibration wear and tear on covered conductor (GPI). <p>7. GPI commented that Energy Safety should require separate progress report deadlines for the issues covered in SDGE-22-12 (covered conductor inspection and maintenance) and SDGE-22-13 (evaluating the effectiveness of new technologies that support grid hardening and situational awareness) (Res. SPD-1, pgs. A-49 – A-50):</p> <ol style="list-style-type: none"> a. Energy Safety added a requirement to “Required Progress” for SDGE-22-12 and SDGE-22-13 that utilities provide a report on progress on these aspects of the covered conductor effectiveness joint study in their 2023 WMPs. 	
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	<p>Pleadings</p> <p>The GPI performed a review of the IOUs' 2022 WMP Updates with a general focus on risk modeling and the reduction of green waste from vegetation management mitigations. Our comments and recommendation cover the following topics (Comments, 4/11/22, pgs. 1-2):</p> <ul style="list-style-type: none">• The projected increase in electric costs for ratepayers between IOUs varies substantially.• GPI supports the proposal by Will Abrams to tie activities and mitigations in the WMP plans to ignition drivers that resulted in Utility-caused destructive wildfires.• Efforts to mitigate environmental impacts of vegetation management are overly focused on permitting.• IOU MAVF methods appear to still reflect value caps.• IOUs should perform a more complete assessment of the possible impacts of climate change on both PoI and consequence.• A forward look at HFTD mapping.• Risk models and data quality.• WMP guidelines should require that IOUs provide a table of mitigation lifetimes used to determine RSE values in future WMPs.• PG&E's description of research with CalPoly State is ambiguous.	
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	<ul style="list-style-type: none"> • PG&E should clarify how they are determining tree species for past data. • The next WMP cycle should require IOUs to propose a new build standard for locations in HFTD. • Model informed risk-based decision making is still not a transparent process. • IOUs have yet to successfully model risk on egress/ingress routes. <p>GPI greatly appreciates the efforts of Energy Safety in issuing a comprehensive draft decision and format that includes extensive data review and supporting figures. We also appreciate the alignment of 2022 WMP Update content review and maturity model status in the IOU Draft Decisions. We provide comments on the following aspects of the SDG&E 2022 WMP Draft Decision: [Comments, 6/3/22, pgs. 1-2.]</p> <ul style="list-style-type: none"> • The SDG&E Draft Decision largely looks to establish expectations for 2023 WMP filings and the next 3-year WMP cycle. • The independent expert assessment on SDG&Es risk reduction impact assessment tool should be publicly available. • Risk Assessment and Mapping Maturity Survey responses regarding confidence level need to be substantiated by the utility and confirmed by Energy Safety and/or an independent evaluator. • GPI supports the requirement to evaluate and incorporate risk 	
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	<p>from wildfires that burn longer than 8 hours. We recommend expanding this issue/requirement to also incorporate risk from PSPS events that last longer than 8 hours.</p> <ul style="list-style-type: none"> • The Utilities should perform an assessment of wildfire consequence modeling limitations in developed “unburnable” locations and whether additional considerations are needed to quantify wildfire consequence in developed locations. • GPI supports SDGE-22-18 but recommends providing additional guidance regarding how SDG&E should classify equipment failure risk events that ensure risk event classifications are consistent between the utilities. • Expand SDGE-22-20 Progression of Effectiveness of Enhanced Clearances Joint Study to include an evaluation and cost benefit analysis of line-to-sky vegetation clearing practices. • GPI supports the proposed scoping meetings and recommends providing additional guidance regarding meeting timing. 	
<p>3. Review of 2022 SCE WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-2 by performing a detailed analysis of SCE’s 2022 WMP update, and</p>	<p>Resolution SPD-2</p> <p>SCE submitted its WMP Update for 2022 on February 18, 2022, and provided an overview of the WMP in a workshop overseen by Energy Safety on March 10, 2022. Comments on the WMPs were due on April 11, 2022 and</p>	

<p>providing the Commission with the results of our analysis and our recommendations for fixing deficiencies in the plan before the end of the three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to SCE, and in drafting their decision to accept the update, which SPD-2 endorses. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>reply comments were due on April 18, 2022. Comments were provided by the California Department of Fish and Wildlife (CDFW), the Green Power Institute (GPI) ... [Res. SPD-2, pg. 4.]</p> <p>GPI, Cal Advocates, MGRA, and SCE submitted timely comments to Energy Safety on or before June 22, 2022 and SCE submitted reply comments on July 5, 2022 on Energy Safety’s draft decision on SCE’s 2022 WMP Update. [Res. SPD-2, pg. 5.]</p> <p>Energy Safety evaluated these comments and concurred with and in some instances incorporated the following stakeholder input on SDG&E’s 2022 Update, as reflected in this Decision (Res. SPD-2, pgs. 12-12, selected bullet points shown):</p> <ul style="list-style-type: none"> • SCE should “reduce the long-term need for extensive tree trimming and slash production” (GPI). • SCE’s WMP activities and mitigations should address drivers that resulted in utility-caused wildfires (GPI, Abrams). • SCE should evaluate risk outside of the High Fire Threat District (HFTD) based on risk model outputs to identify any necessary additional areas that pose high wildfire risk and adjust its wildfire mitigations activities accordingly (GPI). • SCE and its peer utilities should provide more information on mitigation initiative lifecycle benefits used to determine risk-spend efficiency (RSE) estimates (GPI). • SCE should perform a more complete assessment of the possible impacts of climate change on both probability of ignition and consequence (GPI). • SCE should plan and perform sensitivity analyses on planning models and risk-spend efficiency values in its 2023 WMP (GPI). 	
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	<ul style="list-style-type: none"> • SCE and its peer utilities should report on how they will address Aeolian vibration wear and tear on covered conductors (GPI). <p>Below is a summary of the comments resulting in changes reflected in this Final Decision and a summary of those changes (Res. SPD-2, pgs. A-47 - A-48):</p> <ul style="list-style-type: none"> • GPI recommends SCE provide a plan/method for how they will prevent past-due remediation of work orders in the future. (SCE-22-15) <p>o Energy Safety modified the required progress language of SCE-22-15 to include a required plan to prevent past-due remediation work orders in the future.</p> <ul style="list-style-type: none"> • GPI recommends SCE provide a “root cause analysis” for equipment related ignitions. (SCE-22-16). <p>o Energy Safety modified the required language of SCE-22-16 to include a requirement that SCE conduct a root cause analysis of ignitions from equipment failures.</p> <p>Pleadings</p> <p>The GPI performed a review of the IOUs’ 2022 WMP Updates with a general focus on risk modeling and the reduction of green waste from vegetation management mitigations. Our comments and recommendation cover the following topics (Comments, 4/11/22, pgs. 1-2):</p> <ul style="list-style-type: none"> • The projected increase in electric costs for ratepayers between IOUs varies substantially. • GPI supports the proposal by Will Abrams to tie activities and mitigations in the WMP plans to 	
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	<p>ignition drivers that resulted in Utility-caused destructive wildfires.</p> <ul style="list-style-type: none"> • Efforts to mitigate environmental impacts of vegetation management are overly focused on permitting. • IOU MAVF methods appear to still reflect value caps. • IOUs should perform a more complete assessment of the possible impacts of climate change on both PoI and consequence. • A forward look at HFTD mapping. • Risk models and data quality. • WMP guidelines should require that IOUs provide a table of mitigation lifetimes used to determine RSE values in future WMPs. • PG&E's description of research with CalPoly State is ambiguous. • PG&E should clarify how they are determining tree species for past data. • The next WMP cycle should require IOUs to propose a new build standard for locations in HFTD. • Model informed risk-based decision making is still not a transparent process. • IOUs have yet to successfully model risk on egress/ingress routes. <p>GPI generally supports the Draft Evaluation of SCE's 2022 WMP</p>	
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	Update. We provide the following comments regarding forward looking improvements to both SCE's WMP approach and the WMP guidelines in general. [Comments, 6/22/22, pg. 1.]	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? ²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN, Mussey Grade, PAO, Will Abrams		
d. Intervenor's claim of non-duplication: This proceeding covers a wide variety of topics related to the state's program for wildfire mitigation. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings, and a number of related proceedings, including the wildfire mitigation proceeding, R.18-10-007. The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations through our own unique perspective. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion

² The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding in the Wildfire Safety Division that are relevant to matters covered by this Claim, and a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Resolutions SPD-1, SPD-2 and SPD-3.</p> <p>The hours claimed herein in support of Resolutions SPD-1, SPD-2 and SPD-3 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by this Decision in this case. In preparing Attachment 2, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.</p> <p>Dr. Morris is a renewable energy analyst and consultant with more than 40 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.</p> <p>Dr. Morris has been actively involved in electric utility restructuring in California throughout the past three decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor’s Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.</p> <p>Dr. Harrold has worked for the Green Power Institute (GPI) for a total of more than 10 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard (RPS), the Integrated Resources Planning (IRP) proceeding, the distribution resources planning framework, and the Wildfire Mitigation Plan (WMP) proceeding. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014.</p>	

Decision D.98-04-059 states, on pgs. 33-34, “Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer’s participation will exceed a customer’s costs.” This proceeding is concerned with the development and approval of the wildfire mitigation plans of the wires utilities. The cost reductions and environmental benefits of the WMPs overwhelm the cost of our participation.	
b. Reasonableness of hours claimed: The GPI made Significant Contributions to Resolutions SPD-1, SPD-2 and SPD-3 by actively participating in workshops and working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI’s claim in its entirety.	
c. Allocation of hours by issue: 1. WMP Methodology 40% 2. Review of 2022 SDG&E WMP Update 30% 3. Review of 2022 SCE WMP Update 30%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2022	39.00	465	See comment 1	18,135			
Z. Harrold	2022	108.25	285	See comment 2	30,851			
Subtotal: \$48,986						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$

Subtotal: \$0						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2022	12.00	232.5	½ 2022 rate	2,790			
Subtotal: \$2,790						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
Subtotal: \$0						Subtotal: \$		
TOTAL REQUEST: \$51,776						TOTAL AWARD: \$		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR³		Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation			

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
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³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

Attachment 1	Certificate of Service
Attachment 2	Allocation of effort by issue, list of pleadings, travel receipts
Attachment 3	Breakdown of hourly efforts by issue category
Attachments 4-6	Res. SPD-1, Res. SPD-2, Res. SPD-3
Attachments 7-11	The five pleadings listed in Attachment 2
Attachment 12	NOI
Comment 1	The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 values in the study to 2022 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission's web site. We apply the 3.31 percent escalator to the approved 2021 hourly rate for Dr. Morris, which is \$450/hr (D.22-06-042), and round to the nearest 5 percent per established Commission practice.
Comment 2	Dr. Harrold does not yet have an approved rate for 2021. GPI has requested a rate for Dr. Harrold for 2021 of \$280/hr. This rate request is pending in Claims filed in R.14-08-013 et. al. (filed 10/22/21), R.18-10-007 (filed 2/11/22), and R.20-05-003 (filed 3/4/22). The latter request in R.20-05-003 also includes a request for Dr. Harrold for 2022 of \$285, based on applying the 3.31 percent adjust as discussed above for comment 1. That is the rate we are requesting here as well.

D. CPUC Comments, Disallowances, and Adjustments *(CPUC completes)*

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **Green Power Institute** [has/has not] made a substantial contribution to **SPD-1, SPD-2, and SPD-3.**
2. The requested hourly rates for **Green Power Institute**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **Green Power Institute** shall be awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **Green Power Institute** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **Green Power Institute** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **Green Power Institute**'s request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	Resolutions SPD-1, SPD-2, and SPD-3		
Proceeding(s):	A.22-12-0xx		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	Dec. 16, 2022	\$51,776		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert	465	2022	
Zoë	Harrold	Scientist	285	2022	

(END OF APPENDIX)